

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**IN RE:**

**DAWNA URSO COX**

**Debtor**

) **Case No.: 18-36255-KRH**

) **Chapter 13**

)

)

2019 FEB 15 AM 11:41  
U.S. BANKRUPTCY COURT  
RICHMOND DIVISION

**FILED**

**DAWNA URSO COX**

**Plaintiff,**

**v.**

**KEN PRICE**

**and**

**TIMOTHY S. FEEHAN, TRUSTEE,**

**Defendants.**

) **APN: 19-03003-KRH**

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**DEFENDANT TIMOTHY S. FEEHAN'S ANSWER TO PLAINTIFF'S  
COMPLAINT TO DETERMINE THE VALIDITY, PRIORITY OR EXTENT OF LIENS**

The Defendant, Timothy S. Feehan, in his capacity as Trustee of a certain Deed of Trust relating to the property that is the subject of Plaintiff's immediate Complaint, for his Answer to Plaintiff's Complaint to Determine the Validity, Priority or Extent of Liens, states as follows:

1. Mr. Feehan admits the allegations set forth in paragraph 1 of Plaintiff's Complaint.
2. Mr. Feehan admits the allegations set forth in paragraph 2 of Plaintiff's Complaint.
3. Mr. Feehan admits the allegations set forth in paragraph 3 of Plaintiff's Complaint.
4. Mr. Feehan admits the allegations set forth in paragraph 4 of Plaintiff's Complaint.

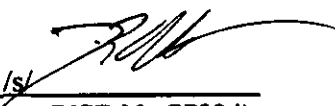
5. Mr. Feehan lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 5 of Plaintiff's Complaint and therefore denies them and demands strict proof thereof.
6. Mr. Feehan lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 6 of Plaintiff's Complaint and therefore denies them and demands strict proof thereof.
7. Mr. Feehan admits the allegations set forth in paragraph 7 of Plaintiff's Complaint.
8. Mr. Feehan lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 8 of Plaintiff's Complaint and therefore denies them and demands strict proof thereof.
9. Mr. Feehan lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 9 of Plaintiff's Complaint and therefore denies them and demands strict proof thereof.

WHEREFORE, Timothy S. Feehan, in his capacity as Trustee of the Second Deed of Trust, respectfully requests that this Court deny Plaintiff's prayer for relief and declare that the Second Deed of Trust is secured, that the Second Deed of Trust should be treated as secured in Plaintiff's Chapter 13 Plan, and for such other relief as the Court may deem appropriate.

Dated February 15, 2019

Respectfully submitted,

TIMOTHY S. FEEHAN  
By Counsel

  
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/s/ Benjamin M. Andrews (VSB No.77824)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of February, 2019, I filed the foregoing with the Clerk of Court, who will then send notification of such filing (NEF) via the CM/ECF system to the following:

James E. Kane  
Kane & Papa, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219  
804-225-9500  
Facsimile 804-225-9598  
[jkane@kaneandpapa.com](mailto:jkane@kaneandpapa.com)

A handwritten signature in black ink, appearing to be "JK", is located to the right of the contact information.